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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 ANGELA ALLEN, individually,

CASE NO.: 2:17-cv-02204-APG-NJK

10 Plaintiff,

11 vs.

**STIPULATION FOR EXTENSION OF  
DISCOVERY DEADLINES (First Request)**

12 TARGET CORPORATION, a Foreign Corporation;  
DOES I – X, inclusive; and ROE  
13 CORPORATIONS I – X, inclusive,

14 Defendants.

15  
16 The above named parties, by and through their respective counsel of record, hereby submit  
the following STIPULATION FOR EXTENSION OF DISCOVERY DEADLINES (First Request).

17 **A. DISCOVERY COMPLETED TO DATE**

18 This matter involves a slip and fall at one of Defendant's stores. On September 20, 2017, the  
19 parties held an initial Rule 26(f) Conference. Defendant served its initial disclosure of witnesses and  
20 documents on September 18, 2017. Plaintiff served her initial disclosure of witnesses and  
21 documents on September 21, 2017. Plaintiff served her first supplemental disclosure of witnesses  
22 and documents on October 2, 2017. On September 27, 2017, the Court entered a Stipulated  
23 Discovery Plan/Scheduling Order.

24 On October 17, 2017, Defendant propounded a First Set of Interrogatories and First Set of  
25 Requests for Production of Documents upon Plaintiff. Plaintiff served her responses to those written  
26 discovery requests on November 20, 2017. On November 9, 2017, Plaintiff noticed the depositions  
27 of three of Defendant's current employees and the deposition of one of Defendant's former  
28 employees for November 28, 2017. The parties are attempting to schedule additional depositions of

1 Defendant's former and current employees.

2 Defendant has requested Plaintiff's medical records and films directly from her medical  
3 providers through records authorizations provided by Plaintiff.

4 **B. DISCOVERY THAT REMAINS TO BE COMPLETED**

5 Defendant is still obtaining Plaintiff's medical records through authorizations provided by  
6 Plaintiff. Defendant needs to conduct the deposition of Plaintiff, a witness who was with her at the  
7 time of the subject incident, and at least two of Plaintiff's treating healthcare providers once  
8 Defendant has received Plaintiff's medical records directly from the providers. Plaintiff continues to  
9 experience symptoms she attributes to the subject incident and anticipates requiring future treatment  
10 so Defendant believes it is premature to conduct those depositions. Defendant may seek to have  
11 Plaintiff appear for a Rule 35 Examination.

12 Plaintiff has scheduled the depositions of four of Defendant's former and current employees  
13 and intends to conduct the depositions of additional employees and representatives. The parties also  
14 anticipate designating expert witnesses and conducting the depositions of any designated expert  
15 witnesses.

16 **C. REASONS WHY DISCOVERY HAS NOT BEEN COMPLETED**

17 Defendant is still in the process of obtaining Plaintiff's medical records and films. Defendant  
18 needs to obtain those records before conducting the depositions of Plaintiff and her treating  
19 healthcare providers. Defendant also needs to obtain those records and films to provide to  
20 Defendant's medical expert. Also, Plaintiff continues to experience symptoms she attributes to the  
21 subject incident and anticipates requiring future treatment for issues she attributes to the subject  
22 incident. Plaintiff needs to conduct further depositions of Defendant's employees prior to the  
23 disclosure of expert witnesses. All of this discovery cannot be completed and provided to expert  
24 witnesses to allow them to complete expert reports prior to the current initial expert disclosure  
25 deadline. Accordingly, the parties request a sixty day extension of the current discovery deadlines.

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1                   **D.     PROPOSED DISCOVERY SCHEDULE**

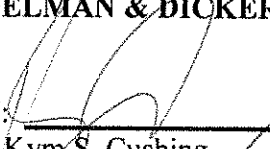
2                                   Close of Discovery:                   April 14, 2018  
3                                   Dispositive Motions:               May 14, 2018  
4                                   Joint Pre-Trial Order:           June 13, 2018  
5                                   Last day to amend pleadings:   Closed  
6                                   Initial Expert Disclosures:     February 13, 2018  
7                                   Rebuttal Expert Disclosures:   March 15, 2018  
8                                   Interim Status Report           February 13, 2018


9       DATED this 29 day of November, 2017.

          DATED this \_\_\_ day of November, 2017.

10       **WILSON, ELSER, MOSKOWITZ,**  
11       **EDELMAN & DICKER LLP**

**MAINOR WIRTH, LLP**

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20                   IT IS SO ORDERED.

21                   Dated this 29 day of November, 2017.

22                                     
23                                   UNITED STATES MAGISTRATE JUDGE